



THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

ZACHARY W. CARTER
Corporation Counsel

MARK D. ZUCKERMAN
Senior Counsel
E-mail: mzuckerm@law.nyc.gov
Phone: (212) 356-3519
Fax: (212) 788-9776

March 1, 2016

VIA ECF

The Honorable John G. Koeltl
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Jane Doe v. City of New York, et. al., 15 Civ. 9137 (JGK)

Your Honor:

I am a Senior Counsel in the office of Zachary W. Carter, Corporation Counsel of the City of New York, representing defendant City of New York in the above-referenced matter. Plaintiff alleges that her constitutional rights were violated by defendants herein when she was allegedly raped on a transport bus while incarcerated at Riker's Island. I write pursuant to Your Honor's Order of January 6, 2016 at Docket 15 to report on the status of any pending investigations, and to extend the stay presently in effect for an additional period of 30 days, to which plaintiff consents.

Since the defendant's motion for a stay on consent was filed on January 6, 2016, the DOC Investigations Division has since referred the matter to the Bronx County District Attorney's Office for investigation. The Bronx County District Attorney's Office has in turn conferred with the United States Department of Justice. Defendant City and the Bronx District Attorney's Office respectfully request that the existing stay be continued for a period of 30 days, to which plaintiff consents. At the conclusion of the additional 30 day period, both sides propose to inform the Court of their respective positions as to how this case should proceed at that time and there should be a better indication at that time as well of any remaining and outstanding investigations.

Thank you for your consideration herein.

Respectfully submitted,

/s/

Mark D. Zuckerman
Senior Counsel

cc: Robert J. Marinelli, Esq. (via ECF)